

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually and on behalf of all others similarly situated,	)	
	)	Civil Case 1:04-cv-10294 DPW
Plaintiff,	)	
	)	
v.	)	
	)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,	)	
	)	
Defendants.	)	
MICHELLE TREBITSCH, on Behalf of Herself and All Others Similarly Situated,	)	Civil Case 1:04 cv 10307 DPW
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SONUS NETWORKS, INC., HASSAN M. AHMED and STEPHEN J. NILL,	)	
	)	
Defendants.	)	

Additional Captions to Follow

**DECLARATION OF THEODORE M. HESS-MAHAN IN SUPPORT OF  
THE MOTION OF THE WEXLER GROUP FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF, AND FOR APPROVAL  
OF SELECTION OF LEAD AND LIAISON COUNSEL**

INFORMATION DYNAMICS, LLC, on behalf of Itself  
and all Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., PAUL R. JONES,  
EDWARD N. HARRIS, J. MICHAEL O'HARA,  
HASSAN AHMED and STEPHEN NILL,

Defendants.

PETER KALTMAN, on Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., RUBIN GRUBER,  
HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

SAMANTHA DEN, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN M. AHMED  
and STEPHEN J. NILL,

Defendants.

RICHARD CURTIS, Individually and on behalf of all  
others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN AHMED and  
STEPHEN NILL,

Defendants.

Civil Case 1:04-cv-10314 DPW

RONALD KASSOVER, on Behalf of the RONALD  
KASSOVER IRA and All Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN M. AHMED  
and STEPHEN J. NILL,

Defendants.

Civil Case 1:04 cv 10329 DPW

STEVE L. BAKER, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

V.

SONUS NET WORKS, INC., HASSAN AHMED and  
STEPHEN NILL,

Defendants.

Civil Case 1:04 cv 10333 DPW

---

MICHAEL KAFFEE, Individually and On Behalf of All Others Similarly Situated,	)	
	)	Civil Case 1:04-cv-10345 DPW
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,	)	
	)	
	)	
Defendants.	)	

---

HAIMING HU, Individually and on Behalf of All Others Similarly Situated,	)	
	)	Civil Case 1:04 cv 10346 DPW
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,	)	
	)	
	)	
Defendants.	)	

---

DANIEL WILLIAMS, Individually and On Behalf of All Others Similarly Situated,	)	
	)	Civil Case 1:04 cv 10359 DPW
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
HASSAN M. AHMED, STEPHEN J. NILL EDWARD T. ANDERSON, PAUL J. FEERRI, PAUL J. SEVERINO and SONUS NETWORKS, INC.,	)	
	)	
	)	
Defendants.	)	

---

---

CHARLES STARBUCK, Individually and on behalf of all others Similarly Situated,	)	
	)	Civil Case 1:04-cv-10362 DPW
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN NILL,	)	
	)	
	)	
Defendants.	)	

---

SAMUEL HO, Individually and On Behalf of All Others Similarly Situated,	)	
	)	Civil Case 1:04 cv 10363 DPW
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SONUS NETWORKS, INC., HASSAN AHMED and STEPHEN. NILL,	)	
	)	
	)	
Defendants.	)	

---

JEFFREY C. RODRIGUES, Individually and On Behalf of All Others Similarly Situated,	)	
	)	Civil Case 1:04 cv 10364 DPW
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SONUS NET WORKS, INC., HASSAN M. AHMED and STEPHEN J. NILL,	)	
	)	
	)	
Defendants.	)	

---

---

ROBERT CONTE and MARK RESPLER, on Behalf of )  
Themselves and All Others Similarly Situated, ) Civil Case 1:04-cv-10382 DPW

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN AHMED and )  
STEPHEN NILL, )

Defendants. )

---

WHEATON ELECTRICAL SERVICES )  
RETIREMENT 401K PROFIT SHARING PLAN, On ) Civil Case 1:04 cv 10383 DPW  
Behalf of Itself and All Others Similarly Situated, )

Plaintiff, )

v. )

SONUS NETWORKS, INC., HASSAN AHMED and )  
STEPHEN J. NILL, )

Defendants. )

---

MICHELLE BURK, Derivatively on behalf of Sonus )  
Networks, Inc., A Delaware Corporation, ) Civil Case 1:04 cv 10384 DPW

Plaintiff, )

v. )

HASSAN AHMED, EDWARD T. ANDERSON, )  
PAUL J. FERRI, RUBIN GRUBER, PAUL )  
SEVERINO, JOHN MICHAEL O'HARA, EDWARD )  
N. HARRIS, STEPHEN NILL, PAUL R. JONES and )  
SONUS NETWORKS, INC., A *DELAWARE* )  
*CORPORATION*, )

Defendants. )

---

BRIAN CLARK, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

V.

SONUS NETWORKS, INC., PAUL R. JONES,  
EDWARD N. HARRIS, J. MICHAEL O'HARA,  
HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

MICHAEL PISNOY, Derivatively on Behalf of Sonus  
Networks, Inc.,

Plaintiff,

V.

HASSAN M. AHMED, RUBIN GRUBER, EDWARD  
T. ANDERSON, PAUL J. FERRI, ALBERT A.  
NOTINI, PAUL J. SEVERINO, PAUL R. JONES,  
EDWARD N. HARRIS, J. MICHAEL O'HARA and  
STEPHEN J. NILL,

Defendants.

SHEILA BROWNELL, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

V.

SONUS NET WORKS, INC., HASSAN AHMED and  
STEPHEN NILL,

Defendants.

---

SAVERIO PUGLIESE, on Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED  
and STEPHEN J. NILL,

Defendants.

---

)  
) Civil Case 1:04-cv-10612 DPW  
)

DAVID V. NOCITO, on Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED  
and STEPHEN J. NILL,

Defendants.

---

)  
) Civil Case 1:04 cv 10623 DPW  
)



Theodore M. Hess-Mahan, declares, under penalty of perjury:

1. I am an associate with Shapiro, Haber & Urmy ("Shapiro Haber"), one of plaintiff's counsel in the action entitled Deborah Chin v. Sonus Networks, Inc., et al., 1:04cv10294 (DPW) (the "Chin Action"). I submit this Declaration in support of the motion of Marc Wexler, Scott Baugh, Sajid Patel, Carlos Rios and Thomas Munson (the "Wexler Group") for consolidation, appointment as Lead Plaintiffs and for approval of selection of Lead and Liaison Counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the notice published by plaintiff in the Chin Action on PR Newswire, a national, business-oriented newswire service, on February 12, 2004.

3. Attached hereto as Exhibit B is a true and accurate copy of a loss chart presenting the transactions in the subject securities and summarizing the estimated collective losses of the Wexler Group at \$365,863.90, in connection with its purchases of Sonus shares.

4. Attached hereto as Exhibit C are the certifications of the members of the Wexler Group.

5. Attached hereto as Exhibit D is a true copy of the firm resume of Cauley Geller Bowman & Rudman, LLP.

6. Attached hereto as Exhibit E is a true copy of the firm resume of Shapiro Haber & Urmy LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 12, 2004.

/s/Theodore M. Hess-Mahan  
Theodore M. Hess-Mahan